Hazardous Waste Management Commission Report

April through June 2015





Hazardous Waste Management Commissioners

Charles "Eddie" Adams, Chair Elizabeth Aull, Vice Chair Andrew Bracker James "Jamie" Frakes Michael Foresman Mark E. Jordan

"The goal of the Hazardous Waste Program is to protect human health and the environment from threats posed by hazardous waste."

For more information:

Missouri Department of Natural Resources
Hazardous Waste Program

P.O. Box 176, Jefferson City, MO 65102-0176 www.dnr.mo.gov/env/hwp/index.html Phone: 573-751-3176

Fax: 573-751-7869

Past issues of the Hazardous Waste Management Commission Report are available online at dnr.mo.gov/env/hwp/commission/quarterlyreport.htm.



Missouri Department of Natural Resources
Hazardous Waste Program

Letter from the Director

Dear Commissioners:

As a first note to this quarter's report, I would like to start out by thanking all of you for your continued service to the commission. You are an outstanding group of commissioners and the department certainly appreciates all you do to help support the work of the Hazardous Waste Program. During this quarter, we unfortunately saw the departure from the commission of our current chair, Deron Sugg. Chairman Sugg did a fantastic job as a commissioner and we are very sorry to see him go, but certainly we want to wish him well in his future endeavors. His departure now leaves us with one vacant position on the commission, but with his leaving, it also helps me to appreciate how fortunate the program is to have the remaining six of you continue to serve. So, I just wanted to take this opportunity to again, thank all of you for continuing your service to the commission.

Chairman Sugg's departure also coincided with the time for new elections. During this quarter, we are glad to welcome Charles (Eddie) Adams to the chair and Elizabeth Aull to the vice-chair positions. The program and I look forward to working with you in this capacity in the coming year, and we are confident that you will do a fantastic job in leading the commission.

This quarter also marked significant progress on a couple of key efforts for the program. As you are aware, we were able to present to you a revised fee structure proposal at the April meeting that was a product of a significant work group effort. We certainly appreciate the support you provided in allowing us to move the proposal forward through the formal rulemaking process. In addition, we were able to file the proposed rule package for our "No Stricter Than" rules and hold the public hearing during this quarter, putting us on schedule to meet the statutory time frames of having the rules in place by the end of the year. We also met our goal of having our new electronic generator reporting system up and running to make reporting more convenient and easier for our generators and facilities.

The program, this quarter, also kicked off this year's pesticide collection efforts at an event on May 30, in Portageville. It was a very successful event as we had 37 participants bring in approximately 29,700 pounds of pesticides. This was the largest collection by volume that we have had, as the previous record was 25,595 pounds from our Warrenton collection held in September of 2012. This was an exciting way to start our collections this year. We have four other events scheduled this year and we are hoping for continued successful collections at those locations as well.

The program continues to stay very busy with our day to day work of ensuring compliance with the regulations and overseeing the cleanup of sites impacted by releases of a variety of different hazardous substances and petroleum. We hope you enjoy reading about these efforts in this edition of the quarterly and again, thank you for all you do to support the program.

Sincerely,

David J. Lamb Director

god of Land

Table of Contents

Remediation	4
Brownfields/Voluntary Cleanup Certificates of Completion	4
Table – Sites in Brownfields/Voluntary Cleanup Program	6
Table – Drycleaning Environmental Response Trust Fund	7
Table – Reimbursement Claims	8
Permits	9
Groundwater and Surface Water Tracing	9
Enforcement	14
Regional Office Hazardous Waste Compliance Efforts	14
Underground Storage Tank Compliance and Technology Unit	14
Special Facilities Unit	15
Hazardous Waste Enforcement Unit	15
Pesticide Collection Event April-June 2015	
Quarterly Report Summary	16
Table - Underground Storage Tank Facilities with Unknown	
Financial Responsibility Status Report	17
Fanks	19
Fable – Tanks Regulations, Closures and Cleanups Attachment	19

Brownfields/Voluntary Cleanup Program Certificates of Completion

Brownfields are real property where the expansion, redevelopment or reuse of which may be complicated by the presence or potential presence of a hazardous substance, pollutant or contaminant. Cleaning up and reinvesting in these properties protects the environment, reduces blight and takes development pressures off greenspaces and working lands. Through this program, private parties agree to clean up a contaminated site and are offered some protection from future state and federal enforcement action at the site in the form of a "no further action" letter or "certificate of completion" from the state.

The Brownfields/Voluntary Cleanup Program (BVCP) issued four certificates of completion for various sites from April through June 2015. This brings the total number of certificates of completion issued to 759.

River Roads Shopping Center-Outlot C – Jennings

The River Roads Shopping Center-Outlot C site is located at Jennings Station Road and Halls Ferry Road, Jennings. The site is a 5.1-acre portion of a 60-acre former shopping mall that contained a grocery store. A total of 23,700 square feet of asbestos-containing floor tile and mastic were removed and properly disposed, along with minor amounts of other asbestos-containing materials. Mercury light bulbs and miscellaneous chemicals were removed and properly disposed. The building was demolished and the site prepared for redevelopment. The department determined the site is safe for its intended use.



Chillicothe Rail Yard - Chillicothe

The Chillicothe Rail Yard site, located at 2 Jackson St., Chillicothe was developed in 1890 as a railroad track with at least one passenger depot. Currently, the subject property includes an approximately 1.25-mile tract of

land developed as a railroad track and spur with a two-track rail yard. An office building and a worker building are present on the property, as well as a cargo container used to hold flammable materials and another railcar used for general storage. A fenced area located south of the worker building holds a variety of equipment. Various equipment storage areas on the gravel ground surface are also present, adjacent to the tracks.

A Phase II Environmental Site Assessment was conducted at the property and found elevated levels of lead and arsenic in soil at various depths throughout the site. All other soil contamination was either below detection limits or below default target levels. A Tier I Risk assessment was conducted in 2013, according to the Missouri Risk Based Corrective Action (MRBCA) 2006 guidelines, to determine the risk posed by arsenic and contamination in soil. The assessment concluded arsenic and lead concentrations were within expected background levels for Livingston County and therefore do not pose an excess risk. The site, therefore, qualifies for unrestricted use. The department determined the site is safe for its intended use.







Concord Cleaners (former) – Jefferson City

The Concord Cleaners (former) site, located at 1011 Missouri Blvd., Jefferson City, has been a dry cleaner facility for more than 50 years. Tetrachloroethylene was discovered in the soil during a Phase II site investigation at a concentration above the department's residential target level. A subsequent investigation, conducted near the original Phase II sampling point, indicated non-detect for tetrachloroethylene in the soil. A groundwater well was installed at this location and a groundwater sample from it yielded a concentration under the

department's default target level. All contaminant concentrations were compared to the values listed in the MRBCA guidance document of 2006. The department determined the site is safe for its intended use.

Express Valet Cleaners - St. Louis

The Express Valet Cleaners site, located at 2501 S. Kingshighway Blvd., St. Louis, is 0.20 acres with a two-story brick building. This property was developed in the early 1900s and has operated as a dry cleaners since at least 1989. During a Phase II Environmental Site Assessment, chlorinated solvents from dry cleaning operations were found in soil and groundwater. After groundwater sampling, it was determined the exposure pathway for the domestic use of groundwater is incomplete, and the contaminant levels present are a small fraction of the target levels for residential exposure to indoor inhalation of vapors. Because of this and the restricted flow of groundwater due to the clay present at the site, it meets the standards for unrestricted use. The department determined the site is safe for its intended use. The property will remain an active dry cleaning facility.

Sites in Brownfields/Voluntary Cleanup Program

Month	Active	Completed	Total
April 2015	231	757	988
May 2015	233	757	990
June 2015	233	759	992

New Sites Received: 10

April

Centerline Stone, Kansas City

Paul Mueller Company Electropolishing Room, Springfield

North Kansas Expressway Development, Springfield

Buckeye North St. Louis Terminal, St. Louis

May

Altus Office Building - Ladue Rd., St. Louis Metro North Crossing, Kansas Citys

June

Hazelwood Commerce Center Parcel 2, Hazelwood

Didion Foundry (former), St. Peters

North Riverfront Stadium Site - OU1, St. Louis

Squaw Creek National Wildlife Refuge, Forest City

Sites Closed: 4

April

River Roads Shopping Center - Outlot C, Jennings Chillicothe Rail Yard, Chillicothe

June

Concord Cleaners (former), Jefferson City Express Valet Cleaners, St. Louis

Drycleaning Environmental Response Trust Fund

The Department of Natural Resources' Drycleaning Environmental Response Trust (DERT) Fund provides funding for the investigation, assessment and cleanup of releases of chlorinated solvents from drycleaning facilities. The two main sources of revenue for the fund are the drycleaning facility annual registration surcharge and the quarterly solvent surcharge.

Registrations

The registration surcharges are due by April 1 of each calendar year for solvent used during the previous calendar year. The solvent surcharges are due 30 days after each quarterly reporting period.

Calendar Year 2015	Active Drycleaning Facilities	Facilities Paid	Facilities in Compliance
January - March 2015	136	59	48.38%
April - June 2015	136	112	82.35%

Calendar Year 2015	Active Solvent Suppliers	Suppliers Paid	Suppliers in Compliance
January - March 2015	11	8	72.73%
April - June 2015			

Cleanup Oversight

Calendar Year 2015	Active Sites	Completed Sites	Total
January - March 2015	20	15	35
April - June 2015	20	15	35

New Sites Received: 0 Sites Closed: 0

Reimbursement Claims

The applicant may submit a reimbursement claim after all work approved in the work plan is complete and the DERT Fund project manager has reviewed and approved the final completion report for that work. The DERT Fund applicant is liable for the first \$25,000 of corrective action costs incurred.

Month	Received	Under Review	Paid/Processed
April	0	0	0
May	0	4	1
June	0	0	0

Month	Received	Under Review	Paid/Processed
April	\$0.00	\$0.00	\$0.00
May	\$0.00	\$320,172.52	\$118,200.25
June	\$0.00	\$0.00	\$0.00

One reimbursement claim was processed/paid during this period:

Tri-States Service Company - East Trafficway, Springfield \$118,200.25

Total reimbursements as of June 30, 2015: \$2,784,107.05

DERT Fund Balance as of June 30, 2015: \$324,734.58

Groundwater and Surface Water Tracing

Protecting human health and the environment is the department's main mission at any hazardous waste treatment, storage and disposal facility, but even more so at facilities where hazardous wastes or hazardous waste constituents have been released to the environment. This includes protecting Missouri's most vital natural resources, groundwater and surface water. Missourians use groundwater and surface water in a number of ways, including drinking, bathing, irrigation, fishing, recreation and education. Protecting and cleaning up, or remediating, these resources can be difficult due, in part, to the majority of the state being underlain by thick, carbonate rock units that are susceptible to dissolution when exposed to mildly acidic precipitation. Over time, this can lead to the development of karst features such as caves, springs, sinkholes and losing streams.

Missouri Department of Natural Resources - Hazardous Waste Program

Almost 60 percent of Missouri is underlain by karst features. This creates a challenge for environmental consultants and regulators in assessing releases to groundwater and interconnected surface waters. Identifying karst features is an essential component in developing accurate and complete conceptual models of site conditions, defining groundwater contaminant plumes and their interconnection to surface waters and selecting effective cleanup remedies. Groundwater and surface water tracing provides a unique, non-intrusive solution to identifying preferential flow paths and karst features at the local scale.

What is Water Tracing?

Water tracing has been performed throughout Missouri for a number of years using various types of "tracers." The overall goal of a water trace is to determine if a connection exists between the point of introduction of a tracer and other remotely located points. Some early traces were performed using wheat chaff or other solid particles as a tracer to prove connections from losing streams and caves to springs and water wells. Today, most water traces are conducted using non-toxic fluorescent tracer dyes, providing a safe and effective alternative to previous methods. Anyone involved in groundwater or surface water tracing in Missouri, for any purpose, is required to register with the Missouri Geological Survey (MGS).

In order to determine if a water tracing study may benefit a particular site or area of interest, a thorough review of local well boring logs, groundwater elevation maps, aerial photos, structural contour maps and topographic maps should be conducted. If the review indicates karst features and preferential flow paths are controlling shallow groundwater flow, a water tracing study may be needed to identify pathways through which contamination could migrate and pose actual or potential risks to human health or the environment due to exposure.

Designing and Implementing

The best time to conduct a water tracing study is when an aquifer is actively recharging (i.e., precipitation and infiltration are such that any introduced tracers are induced to move in the subsurface). This increases the likelihood of the dye reaching the groundwater and being carried to a surface discharge point(s). In Missouri, the best time for conducting tracer studies is typically in the spring and early summer. In karst systems, access to subsurface flow conduits may vary with changes in water table elevation or groundwater flow direction. For example, a spring in a karst environment may only flow during heavy precipitation events when the water table rises. The physical connection between an aquifer and a spring may exist whether or not the spring is flowing; however, depending on the conditions under which the water trace study is performed, this connection may or may not be identified. A positive detection of dye at a location remote from where the dye was introduced proves a connection exists, but the lack of a positive dye detection does not necessarily mean that a connection does not exist.

Like other subsurface investigation techniques, designing and implementing a water tracing study is a multi-step process. The first phase in the planning process includes a review of historical water traces that have been conducted in the area of interest. The MGS water tracing database includes information on nearly 500 water tracing studies. MGS also maintains sinkhole and spring databases, all of which should be checked when designing a water tracing study.

The next phase in the design process is conducting a background study. The purpose of the background study is to (1) field verify proposed dye injection and potential receptor locations, (2) obtain baseline dye concentrations related to other studies that may be in progress and/or may be present due to other environmental releases (e.g., antifreeze spills), and (3) select the type of dye to be used during the trace. There are five common dyes used in water tracing. These dyes include: eosine, fluorescein, pyranine, rhodamine WT, and sulforhodamine B. Although all five dyes are considered acceptable for water tracing, the background study will help identify the preferred dye by evaluating baseline conditions and determining if manmade or naturally occurring conditions may interfere with the use/ detection of a particular dye.

After the background study, dye is introduced at the selected location(s). A typical study consists of one dye injection location and multiple potential reception points. Depending on the goal of the study and the volume of dye being injected, the dye may be introduced to the subsurface through a karst feature, a trench or a monitoring well. In order to get the dye to move within the subsurface, a large amount of water may be used to flush the dye into the subsurface during the dye injection process. If the dye is introduced at or near a known or suspected contaminant source area, this may be a good opportunity to collect additional source area information.



Figure 1: Eosine dye being added to a trench at a former hazardous waste management facility in Springfield, MO

When selecting the number and location of potential reception points, the locations should be chosen so a sufficient number of known reception points will be monitored and all potential reception points will remain accessible throughout the expected duration of the trace. Monitoring known reception points increases the likelihood of dye being detected during the course of the trace. This is important to the validity of the trace because if the dye is not detected at any of the monitored locations, there is no way of knowing if the dye is moving through the system.

The sampling frequency and length of the study are selected based on scale, objective and estimated groundwater velocities. Dye may be detected at a reception point by using either a small carbon packet

to which dye is adsorbed or by collecting water samples. If carbon packets are used, data is collected via systematic collection and replacement of carbon packets at each location throughout the duration of the trace. Field staff may also collect a water sample while replacing the packets to get a dye concentration snap shot in the water at that location.

Interpreting the data

Water tracing laboratories with spectrofluorophotometers have the ability to separate tracer dyes from many other fluorescent compounds, allowing the laboratory to report dye detections as a concentration. By sampling at a fixed reception point, dye concentrations can be measured as a function of time. The shape and magnitude of the dye-recovery curve is a function of the amount of dye injected, the velocity and magnitude of flow, the mixing characteristics of the flow system, the sampling interval and sample dilution.

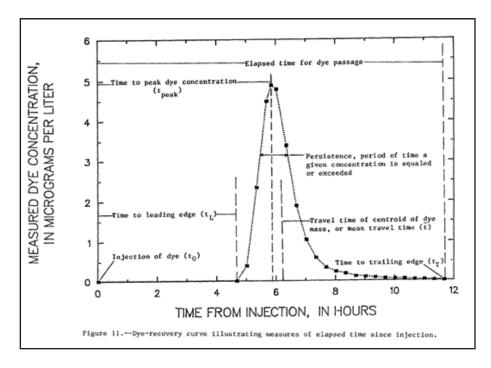


Figure 2: Dye-recovery curve from EPA Dye-Tracing Techniques (1988)

Using the data

A conceptual site model (CSM) is a critical planning and decision-making tool that helps the regulators and the regulated facility develop information about a facility's characteristics and environmental setting. The CSM is a facility-specific written or pictorial description of the source(s) of contamination and the pathways contamination could take from the point(s) of release to humans, animals and the environment. Data obtained from the water tracing study may be used to test and refine the CSM, particularly with respect to preferential subsurface flow pathways and resulting potential contaminant exposure pathways. As the CSM is refined, gaps in the groundwater or surface water monitoring network may be identified and recommendations for alterative or additional monitoring locations developed. This may include ongoing monitoring of identified connections between groundwater and surface water bodies.

The dye-recovery curve may also be used to estimate groundwater flow velocities for proven connections and, depending on the groundwater contaminants of concern, estimate contaminant

transport rates along individual pathways. As a result, the resources available for investigation and remedy can be focused on contaminant pathways that represent the greatest actual or potential exposure risks to humans and the environment.

Case Study

In Missouri, water tracings studies have been conducted at some hazardous waste management facilities exhibiting groundwater contaminant plumes. The figure below (Figure 3) shows the preliminary results of a water tracing study conducted at a former hazardous waste management facility in Springfield, Missouri.

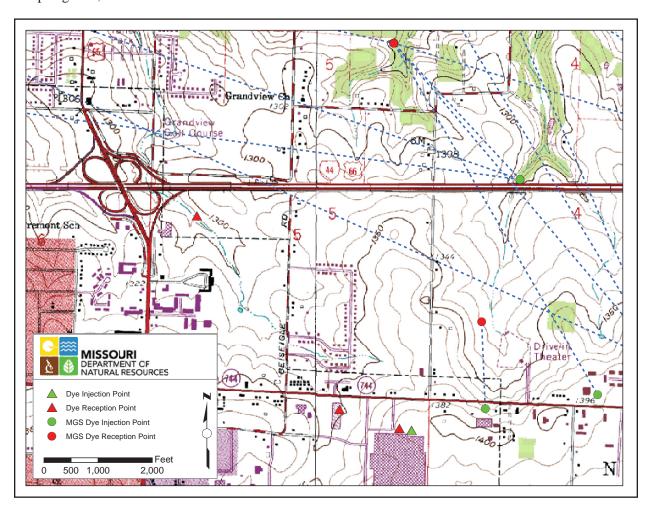


Figure 3: Preliminary results of a water tracing study at a former hazardous waste management facility in Springfield, MO

This facility has a groundwater monitoring network but the department's review of the existing data indicated knowledge of the groundwater contaminant plume and CSM were lacking. This facility was selected for water tracing based on the known karst conditions in the area, potential for preferential subsurface groundwater flow and the presence of an onsite groundwater divide. Eosine dye was introduced at a trench excavated onsite, near a former drum storage pad. A background study was conducted and thereafter carbon packets were deployed at eleven onsite monitoring wells, four onsite ponds, and eighteen off-site locations. The length of the water tracing study was nine weeks, with carbon packets replaced weekly. Dye was detected at one onsite monitoring well, one onsite pond and

one off-site surface water location. All three locations were located west to northwest of the point of injection. The initial data indicates groundwater flow is moving along preferential features oriented northwest to west at a groundwater flow rate greater than previously anticipated. The facility intends to use this information to revise their CSM and improve their groundwater monitoring network.

In conclusion, water tracing is just one tool in the hydrogeology site characterization and investigation toolbox. When properly conducted, the information obtained from a dye trace study can provide a unique insight into the behavior of groundwater flow in karst aquifers including interconnection(s) with surface water bodies. These studies can also help in developing comprehensive conceptual site models. When combined with more traditional methods of subsurface investigation and monitoring, the information may be used to better delineate groundwater contaminant plumes, assess surface water interconnections and develop more efficient/effective cleanup strategies.

Regional Office Hazardous Waste Compliance Efforts

- Conducted 99 hazardous waste generator compliance inspections:
 - 40 at large quantity generators
 - 32 at small quantity generators
 - 17 at conditionally exempt small quantity generators
 - Eights at E-waste recycling facilities
 - Two at resource recovery facilities
- Conducted 11 compliance assistance visits at hazardous waste generators
- Conducted one targeted re-inspection at hazardous waste generators
- Issued 43 letters of warning and 13 notices of violation requiring actions to correct violations cited during the 99 inspections conducted
- Received and investigated a total of 52 citizen concerns regarding hazardous waste issues

Underground Storage Tank (UST) Compliance and Technology Unit (CTU)

Tank inspection contract – During the reporting period, the request for proposal (RFP) for the new tank inspection contract closed with the submittals currently under review. The inspection contractor conducts inspections of active underground and aboveground storage tanks for the Missouri Department of Natural Resources and the Missouri Petroleum Storage Tank Insurance Fund (the Fund). You may contact the Missouri Office of Administration for details.

Operator training – Operator training is now available online. Class A/B operator training and Class C operator training are both available, as well as a "test only" option. The draft rule is also available online, which includes a compliance deadline of July 1, 2016. The department and the fund will also be accepting reciprocity from some of our neighboring states. The training program and draft rule may be found on the fund's webpage: http://optraining.pstif.org/intro/

Federal Rule changes – In 2011, EPA proposed significant changes to the UST regulations. The final version of those rules is expected to be announced shortly. The proposed rule includes new testing requirements for release detection equipment, overfill prevention equipment (e.g. flapper valves, ball float valves and alarms), spill buckets and containment sumps. Under the proposed changes, previously deferred airport fuel hydrant systems, field constructed tanks and even some oil water separators will now be regulated. Missouri must also include a new requirement for all new systems installed after July 1, 2017 to be double walled with enhanced leak monitoring. For updates and information on these upcoming rule changes, please visit our webpage: http://dnr.mo.gov/env/hwp/ustchanges.htm

Tank Inspections – State Fiscal Year 2015 contract inspections are complete. Department inspections continue. As we have seen in previous years, Missouri owners, operators and contractors continue to demonstrate their proactive compliance by being responsive to issues when found and demonstrating a willingness to be a partner in ensuring all Missouri USTs are in compliance. The department is maintaining compliance with the EPA requirement of inspecting all regulated facilities at least every three years. The department must also demonstrate all facilities are either in compliance or are moving to gain compliance. This goal is much easier to accomplish when owners, operators, contractors and regulators are all working together.

Financial Responsibility – Efforts continue to resolve violations with facilities that did not maintain a financial responsibility (FR) mechanism to address releases and to protect third parties. Because of these efforts by UST CTU staff and the Attorney General's Office, the number of facilities without a verified FR mechanism continues to remain less than 1.5 percent.

Special Facilities Unit

Commercial Facility Inspectors – Special facilities inspectors conducted five inspections of commercial hazardous waste treatment/storage/disposal facilities (TSDFs) and two inspections of non-commercial hazardous waste TSDFs.

Polychlorinated Biphenyl (PCB) Inspector – The inspector conducted 20 compliance inspections at various types of facilities throughout the state. The inspector's reports are forwarded to the U.S. EPA Region 7, which has authority for taking any necessary enforcement action regarding PCBs according to the Toxic Substances Control Act.

Hazardous Waste Transporters – The inspector conducted 22 commercial vehicle inspections. Five violations were cited and one commercial motor vehicle was put out of service.

Hazardous Waste Enforcement Unit

Enforcement Efforts

- Resolved four hazardous waste enforcement cases
- Received five new enforcement cases
- Sent four penalty negotiation offer letter
- · Issued one letter of warning
- Issued three notices of violation
- Completed five settlement agreements

Miran Investment

On April 4, 2014, a hazardous waste compliance inspection was conducted at the above facility by the Missouri Department of Natural Resources' Hazardous Waste Program. During the inspection, it was noted that regulated amounts of hazardous waste, specifically F002 waste, was on site. After the Aug. 19, 2014 Notice of Violation was issued and attempts to get the owner of Black Tie Cleaners, Yong Park, to correct the violations, the department issued a modified Notice of Violation to the property owner, Miran Investment Company, and Black Tie Cleaners on Nov. 10, 2014.

The property owner had previously committed to addressing the hazardous waste violations well before the department had attempted to contact them, and continued to keep in contact and supplied documentation as requested. On March 11, 2015, the department conducted a follow-up inspection and Miran Investments was able to document that all violations were corrected. Because they did not generate the waste but, as the property owner, accepted responsibility for cleanup and all costs associated with it, and because of their good faith efforts, the department has elected not to pursue Miran Investment Company for any civil penalties in regards to these violations.

Black Tie Cleaners owner, Mr. Yong Park, is currently in contempt of multiple consent judgments for outstanding surcharges, fees and penalties for the Dry Cleaning Environmental Trust Fund. At this time, the Attorney General's Office (AGO) has been unsuccessful in collecting any amounts owed. Detailed searches for potential income and assets for Mr. Park have been utilized by the AGO and have yet to find any financial resources. The department has accepted the AGO's current evaluation of Mr. Park's finances as a demonstration of inability to pay a penalty and therefore will not pursue Mr. Park for civil penalties in regards to these violations.

Martin Foundry

On Sept. 12, 2012, the Kansas City Regional Office inspected Martin Foundry. A notice of violation (NOV) was issued on Oct. 2, 2012, for failure to determine if a waste was hazardous, failure to register as a generator, acting as an unpermitted TSDF, numerous storage violations and numerous safety violations. The Kansas City Regional Office reinspected the facility on Oct. 24, 2013. Violations were noted and corrected on site.

The facility has agreed to pay the sum of \$12,000 as a penalty, of which \$6,000 will remain suspended on the condition there will be no further violations of the Order and the Missouri Hazardous Waste Management Law and/or Regulations for a period of two years of the effective date of the Order. The remaining \$6,000 shall be paid in quarterly installments of \$1,500. The AOC was finalized on April 24, 2015.

Green America Recycling

On Nov. 5, 2014, the Hazardous Waste Program inspected Green America Recycling/Continental Cement and found that Green America had stored hazardous waste in excess of one year, in violation of their permit. The Hazardous Waste Program issued NOV #5716CF to Green America on Feb. 13, 2015. Based on the response from Green America and EPA guidance RO12794, Green America was returned to compliance and the case was closed without penalty on April 27, 2015.

Illegal Drum Dump (David Hill)

On May 7, 2014, the Northeast Regional Office (NERO) investigated a report regarding 55-gallon drums with unknown contents abandoned along County Road 1670, west of Jacksonville. The drums were located and confirmed to be closed and in good condition. NERO made arrangements with the Environmental Services Program to have the drums removed. Upon arrival at the site, the Environmental Services Program could not find the drums, but found dried paint waste in the area. Additional investigation led to the discovery that David Hill had dumped the contents and taken the drums to a salvage yard. NERO issued NOV #NER2014061915495694 to Hill on June 27, 2014.

Mr. Hill had agreed to pay cost recovery of \$1778.40 for costs associated with the attempted cleanup of the abandoned drums. Due to his dire financial situation, the Hazardous Waste Program chose not to seek penalty or cost recovery from Hill. The case was closed April 27, 2015.

Pesticide Collection Event April-June 2015 Quarterly Report Summary

The Pesticide Collection Program conducted two collections during the quarter. The events were a success, bringing in Toxaphene, Strychnine, Arsenic, DDT, 2,4,5-T and many other toxic, banned pesticides. Almost every participant made comments of how thankful they were for this program as they have had this material sitting around for years not knowing what to do with it. The first collection event took place in Portageville, MO, on May 30th, and had 37 participants. Approximately 29,700 pounds of pesticide were collected.

The second event took place in Mt. Vernon, MO, on June 20th,, and had 22 participants. Approximately 2,300 pounds of pesticide were collected. The remaining collection events for 2015 will take place as follows:

- Higginsville: July 18, at the Lafayette County Road and Bridge Facility, 19717 Outer Road
- Owensville: Aug. 15, at the Owensville Police Department, 109 N. Second St.
- Kirksville: Sept. 19, at the Charles Krueger Public Works Complex, 2001 N. Osteopathy

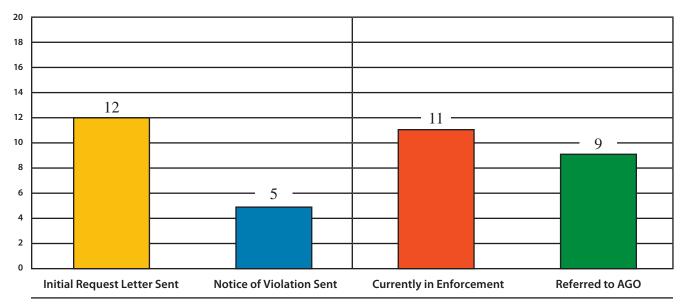
Additionally, a request for proposal (RFP) for pesticide collection services has been issued and proposals were due on April 20, 2015. The RFP is exclusively for services required for pesticide collections and addresses all collection events held in 2015 and beyond. Having a contract in place specifically for

these services will simplify the process and reduce staff time and effort needed during set up and follow through after each event and ensure consistency and high quality of services from our contractors during these events. We have also continued to expand our education and outreach efforts by working on website and fact sheet updates, updating pesticide collection program standard operating procedures and planning for outreach opportunities such as the Cole County Fair and Missouri State Fair.

Underground Storage Tank Facilities with Unknown Financial Responsibility Status Report

Financial Responsibility Status	Number of Facilities
Initial Request Letter Sent	12
Notice of Violation Sent	5
Currently in Enforcement	11
Referred to Attorney General's Office	9
Total Number of Facilities with Unknown Financial Responsibility	37

Number of Facilities in Each Financial Responsibility Step



^{*}This semi-monthly report is derived directly from a copy of the UST Database and provides a "snapshot" of the status for each active underground storage tank facility not covered by a proper Financial Responsibility Mechanism.

Petroleum Storage Tanks Regulation June 2015

Staff Productivity	Jul-14	Aug-14	Sep-14	Oct-14	Nov-14	Dec-14	Jan-15	Feb-15	Mar-15	Apr-15	May-15	Jun-15	TOTAL
Documents received for review	161	189	222	208	163	166	176	189	196	154	193	173	2,190
Remediation documents processed	140	123	146	171	168	116	110	129	145	154	119	201	1,721
Closure reports processed	9	10	14	24	8	13	13	4	10	6	6	5	122
Closure notices approved	9	9	9	9	8	6	7	12	12	10	8	13	112
Tank installation notices received	7	5	6	5	4	3	7	4	9	5	1	6	62
New site registrations	4	7	2	5	5	1	2	2	0	1	2	2	33
Facility Data	Jul-14	Aug-14	Sep-14	Oct-14	Nov-14	Dec-14	Jan-15	Feb-15	Mar-15	Apr-15	May-15	Jun-15	TOTAL
Total in use, out of use and closed USTs	40,756	40,773	40,789	40,807	40,827	40,839	40,848	40,859	40,869	40,875	40,884	40,909	
Total permanently closed USTs	31,676	31,703	31,777	31,806	31,819	31,837	31,857	31,873	31,890	31,904	31,910	31,928	
In use and out of use USTs	9,080	9,070	9,012	9,001	9,008	9,000	8,989	8,984	8,976	8,968	8,971	8,977	
Out of use USTs	739	746	709	702	693	701	696	691	695	686	688	698	
Total hazardous substance USTs	404	404	404	404	404	404	404	405	405	403	403	403	
Facilities with in use and out of use USTs	3,483	3,482	3,461	3,456	3,458	3,455	3,456	3,454	3,455	3,450	3,449	3,450	
Facilities with one or more tank in use	3,229	3,226	3,220	3,218	3,222	3,216	3,217	3,216	3,214	3,214	3,213	3,209	

Closures

Underground Storage Tanks	Jul-14	Aug-14	Sep-14	Oct-14	Nov-14	Dec-14	Jan-15	Feb-15	Mar-15	Apr-15	May-15	Jun-15	TOTAL	All Yrs
Closure Reports Reviewed	9	10	14	24	8	13	13	4	10	6	6	5	122	
Closure Notices Approved	9	9	9	9	8	6	7	12	12	10	8	13	112	
Number of Tanks Closed (Closure NFA)	14	17	43	46	22	18	16	12	33	26	7	17	271	

Cleanup

Underground Storage Tanks													TOTAL	All Yrs
UST release files opened this month	4	7	10	14	7	9	7	5	7	6	3	5	84	6,687
UST cleanups completed this month	8	6	15	7	11	10	2	10	15	12	1	13	110	5,846
Ongoing UST cleanups	865	866	863	869	864	863	866	858	849	844	845	837		
Aboveground Storage Tanks														
AST release files opened this month	1	0	0	2	5	1	0	0	0	1	0	0	10	476
AST cleanups completed this month	2	1	0	2	0	1	0	1	1	4	0	1	13	299
Ongoing AST cleanups	182	181	180	179	183	183	183	182	182	178	178	177		
Both UST and AST														
Total release files-both UST & AST	0	0	0	0	0	0	0	0	0	0	1	0	1	79
Cleanups completed-both UST & AST	0	0	1	1	0	0	0	0	0	1	0	0	3	52
Ongoing cleanups-both UST & AST	29	29	29	28	28	27	27	27	27	26	27	27		
Unknown Source														
Total release files-unknown source	0	1	0	0	0	0	0	0	0	1	0	1	3	228
Cleanups completed-unknown source	0	0	1	0	0	0	0	1	0	1	0	0	3	210
Ongoing cleanups-unknown source	20	21	19	19	20	19	19	19	18	18	17	18		
Documents Processed	140	123	145	171	168	116	110	129	145	154	119	201	1,721	
*Reopened Remediation Cases	0	1	0	0	0	0	0	0	0	0	0	0	1	79

* Reopened Remediation Cases was added Nov. 18, 2009 - the cumulative total has been queried and a running total will be tracked/reported with the FY 2010 Tanks Section Monthly Reports.

Effective December 2008 tanks with unknown substance will be included in total figures.
Some measures are re-calculated each month for all previous months to reflect items added or edited after the end of the previous reporting period.